

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DEC 19 2019
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEMETRIUS INGRAM,

Defendant.

4:19CR1040 HEA/JMB

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jennifer Szczucinski, Special Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. The defendant is charged with felon in possession of a firearm, in violation of 18 U.S.C. §922(g), an offense for which a maximum 10 years imprisonment is prescribed under Title 18.
2. According to St. Louis Metropolitan Police Department Incident Report 19-056167, on November 18, 2019, St. Louis Metropolitan Police Department ("SLMPD") officers were patrolling the Jeff-Vander-Lou Neighborhood ("JVL") when they observed the defendant and another male individual standing on the corner of North Grand Boulevard and St. Louis Avenue. The defendant was wearing a cross-body satchel, which, in the officer's experience, is commonly used to store firearms and narcotics. Due to numerous problems in the JVL with illegal narcotics transactions, the officers pulled up near the men and an officer got out to speak with them, at which time the defendant

ran from area. Officers ran after the defendant and observed him remove a purple pistol from his satchel and put it on or in a trash can as he ran past. The defendant repeatedly refused direction to stop and climbed a chain link fence. Ultimately, the defendant was taken into custody. Officers returned to the location where they saw the defendant discard the pistol and located a purple Taurus PT111 firearm, loaded with 12 rounds. Further investigation revealed the firearm had been reported stolen in May of 2019.

3. The defendant's criminal history reflects that he has multiple felony convictions including, but not limited to, the following:

- 22991-04104, *State of Missouri v. Demetrius Ingram*
Guilty Plea/Sentence Date: June 12, 2000/June 14, 2002
Count One: Attempted Stealing from a Person
Sentence: 3 years MDC*
*Originally given a Suspended Imposition of Sentence
- 22019-05263, *State of Missouri v. Demetrius Ingram*
Guilty Plea/Sentence Date: June 14, 2002
Count One: Assault 3rd Degree
Sentence: 30 days incarceration
- 22029-02489, *State of Missouri v. Demetrius Ingram*
Guilty Plea/Sentence Date: March 10, 2005
Count One: Violation of an Order of Protection
Count Two: Violation of an Order of Protection
Sentence: 1 year incarceration
- 0922-CR02977, *State of Missouri v. Demetrius Ingram*
Guilty Plea/Sentence Date: June 23, 2010
Count One: Robbery in the First Degree
Count Two: Armed Criminal Action
Sentence: 10 years MDC

4. Records related to the defendant's conviction in Cause No. 22991-04104 reflect that the defendant was originally given a suspended imposition of sentence and placed on probation, however, the defendant's probation was revoked and he was sentenced to three (3) years in the Missouri Department of Corrections with the opportunity to receive probation after serving 120 days.

Defendant was denied probation after serving 120 days and was released on parole after serving approximately one (1) year. Records appear to reflect that the defendant was unsuccessful on parole, having absconded from a community release center on multiple occasions after being paroled, resulting in revocations of his parole.

5. There is a serious risk that the defendant will flee, given the defendant's flight from the scene in this case, his failure to comply with supervision while on probation and parole, and the potential sentence the defendant faces in this case.

6. The defendant's criminal history and the nature and circumstances of the offense charged, reflect that there is a serious danger to the community that would be posed by the defendant's release. Further, there are no conditions or combination of conditions that will reasonably assure the defendant's appearance as required.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Jennifer Szczucinski
JENNIFER SZCZUCINSKI, #56906MO
Special Assistant United States Attorney